

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TROVARE-CAPITAL GROUP, LLC,)	
)	
Plaintiff,)	
)	
v.)	No. 08-CV-3133 RCC
)	
SIMKINS INDUSTRIES, INC., et al.,)	Honorable Judge Gettleman
)	Magistrate Judge Nolan
Defendants.)	

NOTICE OF MOTIONS

TO: See attached Service List

PLEASE TAKE NOTICE that on **July 29, 2008 at 9:15 a.m.**, we shall appear before the Honorable Judge Robert W. Gettleman in Room 1703 of the United States District Court, 219 South Dearborn Street, Chicago, Illinois and shall then and there present the following motions, which were filed with the Clerk of the Court using the CM/ECF system and served the same via electronic mail on July 21, 2008. :

- (1) UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT;
- (2) PETITION FOR PRO HAC VICE APPEARANCE OF TIMOTHY C. RUSSELL;
- (3) PETITION FOR PRO HAC VICE APPEARANCE OF PETER N. KESSLER.

Respectfully submitted,

s/ Thomas W. Mulcahy
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Attorney for Defendants

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Trovare Capital Group, LLC v. Simkins Industries, et al.
Case No. 08-CV-3133

SERVICE LIST

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CERTIFICATE OF SERVICE

I, Thomas W. Mulcahy, hereby certify that on July 21, 2008 I electronically filed the foregoing **Notice of Motion** and **(1) Unopposed Motion for Extension of Time to Answer or Otherwise Plead to Plaintiff's Complaint, (2) Petition for Pro Hac Vice Appearance of Timothy C. Russell, and (3) Petition for Pro Hac Vice Appearance of Peter N. Kessler** with the Clerk of the Court using the CM / ECF system which sent notification of such filing to the above named attorney on the service list and shall comply with Fed.R.Civ.P. 5(b)(2)(D) as to any party who is not an E-Filer or represented by an E-Filer.

/s/ Thomas W. Mulcahy
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